REMARKS

Claims 1-7, all the claims pending in the application, stand rejected. Applicants have not amended the claims, as they believe, for the reasons given subsequently, that there is a basis for overcoming the anticipation rejections. Should the Examiner persist in his position, Applicant respectfully requests an interview.

Claim Rejections - 35 U.S.C. § 102

Claims 1 and 5-7 are rejected under 35 U.S.C. § 102(b) as being anticipated by Asao et al (6,462,453). This rejection is traversed for at least the following reasons.

In Applicants' previous amendment, Applicant argued that Asao et al did not teach several features of claim 1. Now the Examiner has responded with the following:

(1) Joining sub portions to form a "polyphase alternating current winding."

The Examiner points to teachings at col. 3, lines 12-22, col. 11, lines 50-65, col. 12, lines 5-25 and 57-67, col. 13, lines 10-40, col. 14, lines 20-30, col. 15, lines 30-60 and col. 17, lines 35-60 as a pertinent teaching.

(2) Use of "ancillary connection portions."

The Examiner points to the structures 34 (left and right) as corresponding to these portions.

Notwithstanding these citations, Applicants submit that there are several differences that support patentability.

Joined End Portions

In the present application, each of the single-phase winding phase portions 161 is constructed by joining the end portions of <u>first to sixth</u> winding sub-portions 32 to 37, <u>as shown in Figure 7</u>. The ancillary connection portion 39 is constructed by the joint portions 31₁₋₆, 31₂₋₃, and 31₄₋₅ each constituting a joint portion between a pair of the end portions of first to sixth winding sub-portions 32 to 37. The ancillary connection portion 39 is located <u>near the axial end</u> of the coil end group 16r and 16f, as shown in Figures 5 and 6.

On the other hand, in Asao et al., each of the singlephase winding phase portions is

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constructed by joining the end portions of <u>first to fourth</u> winding sub-portions 41 to 44, <u>as shown in Figure 10</u>. The joint portion between the end portions 41a and 43b, the joint portion between the end portions 42a and 44b and the joint portion between the end portions 44a and 42b are comparable to the ancillary connection portion of the present application.

However, Asao et al. does not teach or suggest that the ancillary connection portion is located near the axial end of the coil end group, as claimed. From Figure 9, it is clear that the ancillary connection portion of Asao et al. is located in the coil end group.

Joint Portion

The Examiner asserts that the joint portion 34 of Asao et al, is comparable to the ancillary connection portion of the present application. However, the joint portion 34 is constructed by joining the end portions 30c of U-shaped segments 30. The front-side coil end group 16f is constructed by these joint portions 34. Therefore, the joint portions 34 are not comparable to the ancillary connection portion of the present application. Even if the Examiner asserts that the joint portions 34 are comparable to the ancillary connection portion of the present application, the joint portions 34 are not located near the axial end of the coil end group.

Ancillary Connection Portion

As described above, Asao et al. does not teach or suggest that the ancillary connection portion is located near the axial end of the coil end group.

The Cover

The Examiner asserts that the electrically-insulating resin portions 35 are comparable to the cover of the present application.

The cover 27 is formed by molding a glass-reinforced epoxy resin so as to have an internal surface shape which closely contacts the external surface of the ancillary connection portion, and is fitted onto the ancillary connection portion. Namely, the cover 27 is not formed by applying the resin on the ancillary connection portion directly, but is preformed in a separate structure.

By contrast, the resin portions 35 of Asao et al. are each <u>formed by applying the epoxy</u> <u>resin</u> onto the joint portion 34 so as to cover the joint portion 34. Therefore, the resin portions 35 are not comparable to the cover of the present application.

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In other words, the cover 27 in the present invention, particularly as illustrated in Figs 4-6, is defined as a separate structure, as disclosed at pages 16 and 17. The use of a separate structure is emphasized in the claim by use of the term "cover" and the requirements that the cover be "fitted onto each of the ancillary connection portions" and "filled with" a resin. These structural characteristics are not met by the joint portions 34. They are not covers that have the capability of being "fitted" nor can the contain resin, as the structure is the resin material itself.

Finally, claims 5-7, which depend from claim 1, also would be patentable for the same reasons.

Claim Rejections - 35 U.S.C. § 103

Claims 2-4 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Asao et al in view of Tono et el (JP 2001-245454). This rejection is traversed for at least the following reasons.

Claims 2-4 depend from claim 1 and would be patentable for the reasons given already with regard to the distinctions over Asao et al.

The Tono et al reference does not remedy these deficiencies, particularly since it does not teach a cover, or the step of substituting a separate cover for the spray paint coating of Asao et al. The Examiner merely cites Tono et al for a teaching of a second electrically-insulating resin for the purpose of preventing oxidation, as shown in Fig. 3 with regard to element 101. This citation clearly has no relationship to the use of a cover, as claimed. Moreover, the cover creates additional challenges and requirements that, when combined with the additional limitations in the dependent claims, create separate and distinct bases for patentability.

Thus, on the basis of the foregoing analysis, the claim rejections are traversed without amendment to the claims.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

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The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

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